

**REMARKS**

This Application has been carefully reviewed in light of the Final Office Action dated November 15, 2007 ("*Office Action*"). At the time of the *Office Action*, Claims 1-87, 89, and 90 were pending in the Application. In the *Office Action*, the Examiner rejects Claims 1-87, 89, and 90. Applicants amend Claims 1, 11-13, 23, 33-35, 45, 55-57, 67, 77-79, and 90, and cancels Claims 2-6, 22, 24-28, 44, 46-50, 66, 68-72, and 88-89. Applicants add new Claims 91-106. Applicants submit that no new matter is added by these amendments. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

**I. Section 112 Rejections**

The Examiner rejects Claims 1, 23, 45, 67, and 90 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner contends that "the claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed had possession of the claimed invention." (*Office Action*, pages 2-3 (Claims 1, 23, 45, and 67), and page 3 (Claim 90)). With regard to Claims 1, 23, 45, and 67, the Examiner states that Applicants' step of "displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users" is not supported in the original specification. (*Office Action*, page 3). Likewise, the Examiner states with regard to Claim 90 that Applicants' step of "displaying, to a network administrator resource information identifying a plurality of network computers that are used by a single user" is not supported in the original specification. (*Office Action*, pages 3-4). Applicants traverse these rejections for the following reasons.

Applicants respectfully submit that the Specification provides adequate support for above-recited claim limitations. For example, Applicants' Specification states:

A user-centric computer management system according to the present disclosure allows a computer administrator to manage computers and other information technology (IT) resources through a view of the users of those resources. Resources may be represented and displayed graphically to the administrator at a managing computer system via, for example, a computer monitor. To off this view, data models of the existing computer-centric management systems may be modified to include a user-object data structure corresponding to a user . . .

**When a user is associated with one or more computers, the user-object for that user may contain a link to each of the associated computers.** Accordingly, if a computer is associated with more than one user, the user-object for each user may have a link to the computer-object of the associated computer. **In one aspect of the present disclosure, when a user-object for a user is displayed, the system retrieves and displays information stored in the linked computer-objects corresponding to computers with which the user is associated.**

(*Specification*, page 7, line 15 through page 8, line 7, emphasis added). The cited passage clearly describes that a user-object for a particular user may contain a link to each computer to which a user is associated. The cited passages makes further clear that when the user-object for a particular user is displayed, the user-object will include information identifying all computers with which the user is associated.

As further support, Figures 3A - 3B of Applicants' Specification "show examples of a computer-object view and a user-object view according to the method and system of the present disclosure." (*Specification*, page 5, lines 22-23 and page 8, lines 12-13). With regard to the user-object view, specifically, Applicants' Specification states:

Shown in Fig. 3B is a user-object view showing users of the system under a Users heading 226 including Administrator 160, User 1 162, User 2 164 and User 3 166 . . . In this user-object view, Installations area 228 includes application programs associated with User 1, for example, Wordprocessor 206, beneath which is listed the computers, or Targets 230, on which those programs are stored and/or executed. **Additionally, if a user uses a computer, all installations for that computer may be added to the view of installations for the user. Similarly, if the same user also uses another computer, the installations view for that user may include the sum of both computers' installations.**

(*Specification*, Page 9, lines 9-21, emphasis added). Thus, the cited passage indicates that all computers used by a particular user (in the depicted example, Computers A and B) will be shown in the user-object view. As one example implementation, Figure 3B clearly depicts in the user-object view that User 1 uses Computer A as a wordprocessor, Computers A and B for email, and Computer B for CAD.

In view of Figure 3B and at least the passages cited above, Applicants' *Specification* clearly provides written description and adequate support for the Applicants' steps of "displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users," as recited in Claims 1, 23, 45, and 67, and "displaying, to a network administrator resource information identifying a plurality of network computers that are used by a single user," as recited in Claim 90.

For at least these reasons, Applicants submit that the claims as written comply with 35 U.S.C. § 112, first paragraph. Applicants respectfully request reconsideration of Claims 1, 23, 45, 67, and 90.

Additionally, The Examiner rejects Claims 1, 23, 45, 67, and 90 under 35 U.S.C. § 112, first paragraph, for lack of enablement. Specifically, the Examiner contends that the "specification, while being enabling for a special case illustrated in FIG. 3B, does not reasonably provide enablement for displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users," as recited in Claims 1, 23, 45, and 67. (*Office Action*, page 4). Likewise, the Examiner contends that the "specification, while being enabling for a special case illustrated in FIG. 3B, does not reasonably provide enablement for displaying, to a network administrator resource information identifying a plurality of network computers that are used by a single user," as recited in Claim 90. (*Office Action*, page 5). Applicants traverse these rejections for the following reasons.

Initially, Applicants note and respond to the following statements relating to Claims 1, 23, 45, 67, and 90 made by the Examiner in the *Office Action*:

For example, a user can only access two computers in two separate networks in an organization. Two separate networks are managed by two different administrators. So each administrator can only see one computer in the network he administers, and cannot see another one. Therefore, the administrator cannot see “all network computers within a plurality of network computers that are used by the user.”

(*Office Action*, pages 4 and 5). The basis for these statements is unclear to Applicants. Neither Applicants’ Specification nor Applicants’ claims disclose that “a user can only access two computers in two separate networks in an organization.” Rather, Applicants’ claims recite “Applicants object to these statements to the extent that the statements made by the Examiner are contrary to or inconsistent with Applicants’ Specification and claims. Additionally, Applicants note that

Applicants respectfully submit that the Specification is enabling of the above-recited claim limitations. Applicants direct the Examiner to at least the portions of the Specification reproduced above. Specifically, Applicants direct the Examiner to at least page 7, line 15 through page 8, line 7; page 5, lines 22-23; page 8, lines 12-13; and page 9, lines 9-21 of Applicants’ Specification. As further example of enabling disclosure, Applicants’ Specification discloses:

Figure 4 shows an example of a process for selecting and modifying computer systems according to the method and system of the present disclosure. In Step S300, a computer administrator enters information which may include, for example, user name, user role, user group, computer role, computer group, another identifying characteristic of a user or computer, or any combination thereof. This information may be used to search a database and produce a list of users and/or computers satisfying the information input. In step S302, the administrator inputs a policy to be implemented on the users/computers retrieved from the database.

(*Specification*, page 15, line 25 through page 16, line 4). Stated differently, the Specification states that “when a user-object for a user is displayed, the system retrieves

and displays information stored in the linked computer-objects corresponding to computers with which the user is associated.” (*Specification*, page 7, line 15 through page 8, line 7, emphasis added).

At least these passages of Applicants’ *Specification* clearly describe that a user-object for a particular user may contain a link to each computer to which a user is associated. The cited passages make further clear that when the user-object for a particular user is displayed, the user-object will include information identifying all computers with which the user is associated. Accordingly, the cited portions provide disclosure that would clearly enable one of ordinary skill in the art to perform Applicants’ steps of “displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users,” as recited in Claims 1, 23, 45, and 67, and “displaying, to a network administrator resource information identifying a plurality of network computers that are used by a single user,” as recited in Claim 90. Additionally, the cited passages provide disclosure that would reasonably provide enablement for how to identify “all network computers within a plurality of network computers that are used by a selected one of a plurality of users,” as recited in Claims 1, 23, 45, and 67, and how to identify “a plurality of network computers that are used by a single user,” as recited in Claim 90.

For at least these reasons, Applicants submit that the claims as written comply with 35 U.S.C. § 112, first paragraph. Applicants respectfully request reconsideration of Claims 1, 23, 45, 67, and 90.

## **II. Section 103 Rejections**

The Examiner rejects independent Claims 1, 23, 45, 67, and 90 as being unpatentable over U.S. Patent No. 5,933,647 issued to Aronberg et al. (“*Aronberg*”) in view of U.S. Patent No. 6,049,670 issued to Okada et al. (“*Okada*”). The Examiner rejects independent Claims 22, 44, 66, and 89 under 35 U.S.C. § 103(a) as being unpatentable

over *Aronberg* in view of U.S. Patent No. 5,742,829 issued to Davis et al. ("*Davis*"). Additionally, the Examiner rejects dependent Claims 2-21, 24-43, 46-65, and 68-87 under 35 U.S.C. § 103(a) as being unpatentable over various combinations of U.S. Patent No. 5,933,647 issued to *Aronberg* with *Okada*, *Davis*, "SMS 2 Administration," SAMS, February 2000, by Lubanski ("*Lubanski*"), and "Windows 2000 Active Directory," SAMS, February 2000, by Brovick, Hauger, and Wade ("*Brovick*"). Applicant cancels Claims 2-6, 22, 24-28, 44, 46-50, 66, and 68-72, and 89. For the reasons discussed below, Applicants respectfully request reconsideration and allowance of Claims 1, 7-21, 23, 29-43, 45, 51-65, 67, 73-87, and 90.

Independent Claim 1 of the present Application, as amended, recites:

A method for managing a plurality of computers, at least one of the plurality of computers associated with a user having a user characteristic, comprising:

displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users;

receiving selection information from the network administrator, the selection information comprising a user characteristic associated with the selected user;

receiving management information from the network administrator;

identifying, as target computers, each of the plurality of network computers that are used by the selected user;

selecting each of the target computers that are used by the selected user based on the selection information; and

modifying each of the target computers that are used by the selected user based on the management information.

Applicants respectfully submit that the *Aronberg-Okada* combination does not disclose, teach, or suggest the features and operations recited in at least Applicants' independent Claim 1.

For example, Applicants contend that the cited references, even when considered in combination, do not disclose, teach, or suggest at least the following combination of claim elements:

- identifying, as target computers, each of the plurality of network computers that are used by the selected user;
- selecting each of the target computers that are used by the selected user based on the selection information; and
- modifying each of the target computers that are used by the selected user based on the management information.

Although *Aronberg* relates to “a system for distributing software in a customized configuration, to pre-selected computers in a network environment” and includes a workstation running a console for “[creating] distribution control information which dictates how the software is distributed and to what agent based workstations under a given set of conditions” (*Aronberg*, Abstract), the condition expression builder of *Aronberg* is client based rather than user based. Specifically, *Aronberg* discloses that “a condition expression builder . . . controls which computer should install the software” and that such conditions “may be based on the name **of the computer** running the agent, a group membership **of the computer** running the agent, or hard disk capacity **of the computer** running the agent.” (*Aronberg*, Column 3, lines 8-14). Because the system of *Aronberg* is computer-centric rather than user-centric, *Aronberg* does not disclose, teach, or suggest “identifying, as target computers, each of the plurality of network computers that are used by the selected user,” as recited in Claim 1. For analogous reasons, *Aronberg* does not disclose, teach, or suggest “selecting each of the target computers that are used by the selected user based on the selection information,” and “modifying each of the target computers that are used by the selected user based on the management information,” as recited in Claim 1.

The additional disclosure of *Okada* does not cure the identified deficiencies of *Aronberg*. Rather, *Okada* discloses “an on-line system in which individuals can purchase a software program through a network” that imposes on users “[l]imitations on installing

and using the software program.” (*Okada*, Column 1, lines 36-44). For implementing these limitations, *Okada* discloses that a “user information storage unit stores user information, including a user identifier which indicates a user to which the software program is distributed” and that a “terminal information storage unit stores terminal information, including a terminal identifier which indicates a terminal in which the software program is installed.” (*Okada*, Column 2, lines 10-20; Figures 3 and 4). “Using the selling information, the host computer 11 can recognize when, by whom, and to which terminal the software program was sold and installed, to make the selling record of the software program.” (*Okada*, Column 6, lines 44-48). Although *Okada* discloses that a user may have “a plurality of terminals” and that information may be stored for the plurality of terminals,” *Okada* is limited to a system that stores sales information to make sure that software is not used on unauthorized terminals by unauthorized users. There is no disclosure in *Okada* of “identifying, as target computers, each of the plurality of network computers that are used by the selected user,” “selecting each of the target computers that are used by the selected user based on the selection information,” and “modifying each of the target computers that are used by the selected user based on the management information,” as recited in Claim 1.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 1, together with Claims 7-21 that depend on Claim 1. For analogous reasons, Applicants request reconsideration and allowance of independent Claims 23, 45, 67, and 90, together with Claims 29-43, 51-65, and 73-87 that depend on Claims 23, 45, and 67, respectively.

### **III. New Claims 91-106 are Allowable**

New Claims 91-106 have been added and are fully supported by the original specification. No new matter has been added.

New Claims 91-106 depend upon independent Claim 90, which Applicants have shown above to be allowable. Accordingly, dependent Claims 91-106 are not obvious over the various combinations of references relied upon by the Examiner at least because



Claims 91-106 include the limitations of their respective independent claims. Since Claims 91-106 incorporate the limitations of their respective independent claims, Applicants have not provided detailed arguments with respect to new Claims 91-106. However, Applicants remain ready to do so if it becomes appropriate.

For at least these reasons, Applicants respectfully request consideration and allowance of new Claims 91-106.

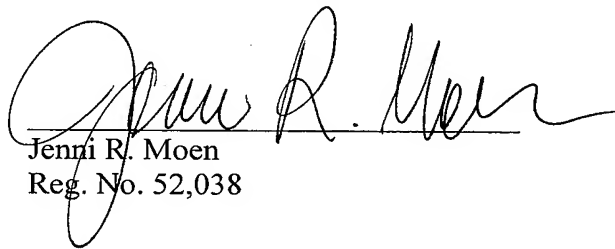
**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Jenni R. Moen, Attorney for Applicants, at the Examiner's convenience at (214) 953-6809.

Applicants believe that no fees are due; however, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,  
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